

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED**May 28, 2020**

United States of America

v.

HEIDI LIN HUBBARD

David J. Bradley, Clerk of Court

Case No. **4:20mj0931***Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 25, 2020 in the county of HARRIS in the
SOUTHERN District of TEXAS, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 1708

Possession of Stolen Mail

This criminal complaint is based on these facts:

See affidavit

☒ Continued on the attached sheet.*Wayne Palomar**Complainant's signature*

Wayne Palomar, Postal Inspector

Printed name and title

Sworn to telephonically.

Date: 5/28/2020City and state: Houston, TX*Peter Bray**Judge's signature*

Peter Bray, Magistrate Judge

Printed name and title

**Affidavit in Support of
Arrest Warrant**

1. I, United States Postal Inspector Wayne G. Palomar, have been employed by the U.S. Postal Inspection Service since 2001. I am currently assigned to the Mail Theft team in Houston, TX and have received specialized training in numerous Postal crimes, primarily those involving mail theft, credit card fraud and bank fraud related offenses. I am familiar with how counterfeit postal arrow keys (used to access locked postal mailboxes) are used to steal mail for financial documents bank checks) and credit cards and then negotiated for profit.
2. The information set forth in this Affidavit is based upon Affiant's personal knowledge and/or information provided to Affiant by other law enforcement officers, fraud investigators, and other individuals the undersigned believes to be reliable and credible.
3. Because this Affidavit is being submitted for the limited purpose of supporting a criminal complaint, Affiant has not included each and every fact concerning this investigation. Affiant has set forth only the facts believed to establish probable cause that Heidi Lin HUBBARD has committed violations of federal law.
4. On May 25, 2020, at 1900 hrs. Harris County Constable Precinct 4 Deputy L. Montano was dispatched to the Holiday Inn Fairfield at 21410 Fairfield Place Drive, Cypress, Harris County, TX 77433. He met with a Hotel Staff Member C. Ramirez. Staff Member Ramirez stated ALEMAN (later identified as HUBBARD) had checked into Room #123 under a company called EDWARDS CONSTRUCTION 2 weeks ago. Since then, 3 additional rooms were added under the company and was occupied by HUBBARD's associates.
5. On this same date, Staff Member Ramirez received a call from Victim L. Fryou regarding an unauthorized charge of \$100.51 at the Holiday Inn Fairfield under the name EDWARDS CONSTRUCTION. Staff Member Ramirez told Deputy Montano the rental agreement for Room #123 had ended (on May 25, 2020). The rental of the room had been paid for each day and HUBBARD had used multiple debit/credit cards to pay for the rooms and many of the cards were declined.
6. Deputies made contact with HUBBARD in Room #123 and identified themselves as Harris County Constables, Precinct 4. HUBBARD answered the door and Deputy Montano observed in plain view a petri dish on the desk with rolled up U.S. Currency on 3 lines of a white powdery substance which, from his training and experience believed to be narcotics. HUBBARD and her boyfriend, Dustin WHITMAN, were detained for a narcotics investigation. While detained, HUBBARD failed to identify herself because she used the alias/personal identifying information (PII-name and date of birth) of Victim M. ALEMAN. Additional contraband was discovered in plain view to include; 44 grams of methamphetamine and 5 grams of Benzodiazepines. They were both placed under arrest for the felony charge of manufacturing a controlled substance and failure to identify (HUBBARD).
7. Precinct 4 Deputies observed in plain view along with the narcotics in Room #123; open and unopened mail, postal keys, a laptop, printer, paper TX Driver Licenses with HUBBARD's photo and another person's personal identifying information (PII: name, dob, DL number), 5 cellphones (receipt showing Samsung Purple Galaxy note purchased in ALEMAN name, approximately 114 personal/business checks, several credit/debit cards (2 debit cards in ALEMAN name) in other people's names, 2 notebooks with handwritten notes of PII of others (to include Victim ALEMAN PII), credit and bank statements in other names, birth certificates, passports, car titles, and 3 Economic Impact Program Checks

(Stimulus Checks) in the names of; Katie Wheeler, Andrew H. Law Jr. and Nelson E. Blanco Medrano.

8. On May 26, 2020, affiant was notified of HUBBARD's arrest. Affiant had an open investigation involving HUBBARD and the use of Victim M. ALEMAN's identity to fraudulently purchase a 2016 Lexus IS 200T for \$31,789.54 (October 23, 2018). This same vehicle was used by HUBBARD to deposit checks stolen out of the mail into a Bank of America account belonging to Robert Brame. Victim M. ALEMAN had indicated in a previous interview she had lost her wallet and fraud credit accounts along with the vehicle purchase were made using her PII.
9. On May 26, 2020, at 1815 Hrs. affiant conducted a mirandized digital recorded interview with Dustin WHITMAN at the Harris County Jail. He stated they (HUBBARD) were common law spouses. Affiant informed him of the familiarity with HUBBARD in an open investigation where she had cashed checks stolen out of the mail using the Bank of America Account belonging to a Robert BRAME.
10. Affiant asked about the mail deputies recovered from the room (#123), he stated Jasmine (Beard) had brought the mail to their room. Affiant asked about postal keys that were in the room and how HUBBARD got the checks (stolen from the mail). He stated Jasmine and other people brought them to HUBBARD. Affiant asked how they cashed the checks, he replied paper I.D.'s. Affiant told him HUBBARD's laptop was recovered and asked him what would be found on it. WHITMAN stated an I.D., "maybe 1 or 2." Affiant asked paper Texas Driver License? He stated "yeah." He would later add that another I.D. would be on it with a picture of a goofy guy. Affiant asked if his fingerprints would be on the mail recovered in his room. He stated he moved stuff around and picked it up. He was sure HUBBARD touched it but Jasmine brought it (mail). He acknowledged HUBBARD looked through it (mail). Affiant again asked about the laptop and if I.D.'s with either Jasmine or HUBBARD's face with other people's name on it would be found, WHITMAN replied "Heidi, maybe one." When asked why just one, he replied that he only saw her work on one using Microsoft. Asked if she cashed checks using the ALEMAN I.D., he didn't believe so because he hasn't seen that I.D. around in a long time.
11. Affiant asked about the postal arrow keys in his room and who brought them there, he replied "probably Jasmine. She said one of her friend's has keys to all the boxes." She told him a friend of hers has a bunch of them (keys), a guy she knows. Asked about the stimulus checks, he claimed Jasmine brought them to his room.
12. On May 27, 2020, Affiant conducted a telephone interview with Victim A. Law regarding the unauthorized possession of mail, specifically a United States Treasury Check #40414 21326962 (stimulus check) in the amount of \$2200, payable to Andrew H Law Jr. and addressed to 21540 Provincial Blvd. Apt 1816, Katy, TX 77450. He lived at the Kingston Villas Apartments in 2015 and did not change the address with the I.R.S. He never received his check which he was waiting for in the mail. He did not know HUBBARD, he did not authorize her to be in possession of his mail/check and he wanted prosecution.
13. On May 27, 2020, Affiant returned to the Holiday Inn Fairfield at 21410 Fairfield Place Drive, Cypress, Harris County, TX 77433 and met with Guest Services Member Brittney Gonzalez. The rental agreement had expired on May 25, 2020 and the property in Room #123 was abandoned. Inspectors viewed the abandoned property and recovered; 3 counterfeit Postal arrow keys, rifled mail and unopened mail from various locations to include 21540 Provincial Blvd. Katy, TX 77450 (Kingston Villas Apartments) and various financial documents in other people's names, counterfeit paper TX Driver Licenses and secondary forms of I.D. with HUBBARD's photo and other people's PII,




14. Chase Bank receipts were recovered with images of U.S. Treasury checks in other peoples names were deposited into a Chase checking account. One of the deposited U.S Treasury Checks was in the name of Jodie L Nelson, 21540 Provincial Blvd.Apt. 228, Katy, TX 77450 (Kingston Villas Apartments), in the amount of \$1200. On this same date, Affiant conducted a telephone interview with Victim J. Nelson who stated the mailboxes at her apartment complex (Kingston Villas) had been broken into and mail was stolen. She never received her EIP/Stimulus check she was waiting for, did not know nor gave permission to HUBBARD to be in possession of her mail/check and wanted prosecution.
15. The Chase Bank receipts listed a Debit Card ending in 2792 (which was recovered and in the name of Abigail Orth) used to deposit the aforementioned check. The Chase debit card was also used to make small purchases along with \$100 debit/cash withdrawals from the same Walmart:

DATE	TIME	AMOUNT	BUSINESS	ADDRESS	CITY	STATE	ZIP
5/25/20	09:23	\$108.81	WALMART	22850 MORTON RANCH RD	KATY	TX	77449
5/25/20	09:25	\$116.19	WALMART	22850 MORTON RANCH RD	KATY	TX	77449
5/25/20	09:26	\$104.83	WALMART	22850 MORTON RANCH RD	KATY	TX	77449
5/25/20	09:27	\$104.30	WALMART	22850 MORTON RANCH RD	KATY	TX	77449
5/25/20	09:28	\$107.55	WALMART	22850 MORTON RANCH RD	KATY	TX	77449
5/25/20	09:29	\$127.04	WALMART	22850 MORTON RANCH RD	KATY	TX	77449

Walmart Surveillance Images for the transactions were obtained depicting a W/F who Affiant recognized from the investigation as positively identified HUBBARD making the transactions with the Chase debit ending in 2792.



16. Based on the forgoing information, Affiant has reason to believe and does believe that, on or about May 25, 2020 Heidi Lin HUBBARD committed the offense of Possession of Stolen Mail, Title 18 USC 1708.


Wayne G. Palomar
United States Postal Inspector

Sworn to telephonically to me this 28 day of May, 2020, and I find probable cause.


Peter Bray
United States Magistrate Judge
Southern District of Texas